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July 19, 1999

BY FAX AND FEDERAL EXPRESSDockets Management Branch (HFA-305)
Food and Drug Administration
Room 1061
5630 Fishers Lane
Rockville, MD 20852Re: Docket No. 98N-1038; ANPR
on Food Irradiation Labeling

Ladies/Gentlemen:

On behalf of our client the National Nutritional Foods Association ("NNFA"), we submit the following comments on the above-referenced Advance Notice of Proposed Rulemaking (64 Fed. Reg. 7834, Feb. 17, 1999).

NNFA, headquartered in Newport Beach, California, is the largest U.S. trade association of suppliers and retailers of dietary supplements and natural food products.

As a matter of principle, NNFA does not favor the irradiation of foods because irradiation can significantly reduce the nutritive value of a food.

Nonetheless, given the fact that FDA permits irradiation of foods under certain conditions, NNFA supports full disclosure to consumers in prominent labeling that a particular food product has undergone treatment with irradiation. NNFA therefore opposes any attempt to water down the requirements in existing FDA regulation 21 CFR §179.26(c) that the label and labeling of retail packages or displays of foods that have been treated with ionizing radiation prominently display the radura logo and the disclosure statement: "Treated with (or by) radiation." While alternative language might be appropriate, but any amendments to the existing required label symbol and statements should not reduce the effect of fully conveying to consumers the fact that the food product involved has been irradiated.

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As far as causing "inappropriate anxiety" among consumers, NNFA is not aware of any properly conducted consumer surveys demonstrating that the existing required language has this result. In the absence of such data, no change to the disclosure requirement is warranted.

Respectfully submitted,

NATIONAL NUTRITIONAL FOODS ASSOCIATION
Patrick Toomey, President
Michael Q. Ford, Executive Director

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